



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

February 8, 2008

Mr. David P. Willis  
Pennsylvania Turnpike Commission  
P. O. Box 67676  
Harrisburg, PA 17106-7676

Re: Southern Beltway I-79 to Mon/Fayette Expressway Draft Environmental Impact Statement and Section 404 Permit Application Washington County PA December 2007 CEQ# 20070518

Dear Mr. Willis:

In accordance with the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act, and Section 404 of the Clean Water Act the U.S. Environmental Protection Agency (EPA) offers the following comments regarding the Southern Beltway I-79 to Mon/Fayette Expressway Draft Environmental Impact Statement (DEIS) and 404 Permit Application. Based on our review of the DEIS, EPA has rated the environmental impacts of the DEIS as "EC" (Environmental Concerns) and the adequacy of the impact statement as "2" (Insufficient Information). A copy of EPA's ranking system is enclosed for your reference. The basis for this rating is contained in the remainder of this letter and the specific comments attached. The following comments relate to the DEIS and Section 404 Permit Application.

**Project History**

This DEIS is the product of one of three independent studies being undertaken to develop a Southern Beltway program of transportation improvement project in a 30 mile corridor between Pittsburgh International Airport in Findlay Township, Allegheny County and the Mon/Fayette Expressway (PA Turnpike 43) near Finleyville, Washington County PA. This DEIS addresses the Southern Beltway Transportation project between I-79 and the Mon/Fayette Expressway. The proposed project is the construction of a new four-lane, limited-access tolled expressway between the I-79 in Cecil Township, Washington County to the Mon/Fayette Expressway in Union Township, Washington County.

**Purpose and Need**

The purpose of the Southern Beltway Transportation project is to provide transportation mobility and safety improvements by drawing traffic onto a modern transportation facility, relieve further congestion, support and serve economic development plans, and improve east/west access and mobility in the circumferential corridor south of the City of Pittsburgh.

The identified project needs are:



- Many of the two-lane roads available for east-west travel through the project area do not meet current design standards.
- There is congestion on the roadways serving the project area.
- There are safety deficiencies because of the inadequate roadway network.
- There is poor east-west mobility for truck access to redevelopment sites in the Mon Valley region.
- There is no circumferential transit service.
- There is poor east-west mobility from the Mon Valley to I-79 and the Pittsburgh International Airport area.

## **Alternatives**

The DEIS evaluates 4 build alternatives in Section 1 and 3 alternatives in Section 2. The Recommended preferred alternative is the Green Alternative Option 1 A for Section 1 and the Tan-Red Alternative in Section 2.

According to the DEIS, the Green Alternative Option 1A would have the least residential (39) and business displacements (2). The other Section 1 Alternatives impact 161, 151, and 107 residents and 12, 13, and 4 businesses respectively. The Green Alternative 1 A also has a lower cost (\$356 million), least impact to productive agricultural land (76 acres), least culverting of stream (4, 064 linear feet), least impact on coal reserves, least impact on forest land (200 acres), and lower traffic impacts during construction.

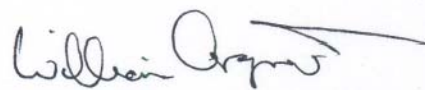
The Green Alternative Option 1A impacts the most acres of wetlands (3.1 acres). It also has 28 stream crossings, 2, 2227 linear feet of stream loss, 4,064 linear feet of stream culverted, 17 acres of floodplain, 200 acres of forest, and 56 acres of rangeland impacts.

The Tan-Red Alternative requires fewer residential displacements (57) and the fewest acres of rangeland (58 acres). This alternative impacts 1.5 acres of wetlands, 33 stream crossings, 4, 391 linear feet of stream culverted, 2, 202 linear feet of stream loss, 3.1 acres of floodplain, and 261 acres of forest. This alternative impacts the most acres of forest.

Considering the potential impacts resulting from a project of this scale, we recommend that the project team continue efforts and coordination with EPA and other state and federal agencies to avoid and minimize impacts to the community and the environment.

Thank you for the opportunity to offer these comments. If you have any questions, please contact Barbara Okorn at (215)814-3330.

Sincerely,



William Arguto  
NEPA Team Leader  
Office of Environmental Programs



## **Specific Comments**

### **Wetlands, Surface Water, Vegetation, and Wildlife**

This project is not water dependant; therefore impacts to aquatic resources should be avoided, minimized and mitigated. The project team should continue to coordinate with the appropriate agencies to further avoid and minimize impacts. In addition to the strategies listed in the DEIS, additional bridging should be considered to minimize impacts to wetlands and waterways.

All stormwater management facilities should be located in upland locations and not impact wetlands or other aquatic habitats.

Borrow and fill locations should not impact environmental resources. These locations should be evaluated in the DEIS, given the potential impacts associated with these activities.

The project team should continue to work with the PA Fish and Boat Commission to avoid and minimize impacts to Cannonsburg Lake.

Mitigation plans should be coordinated with agencies to provide mitigation and monitoring for all unavoidable environmental impacts. Mitigation sites should be deed restricted and have a mechanism in place for repairs and other changes that may be warranted after completion.

The project team should continue coordination with the PA Game Commission to avoid and minimize impacts to the heron rookery.

Page 4-135 discusses the surveys for the state species of special concern, snow trillium, harbinger of spring, wild hyacinth, and Canadian milkvetch that were conducted from 2000 to 2004. Appendix A contains correspondence from DCNR dated November 20, 2007 that states surveys are needed. This issue should be resolved.

### **Community Impacts**

The project team should continue to avoid and minimize community impacts associated with the project. This would include noise and lighting from construction and operation of the highway. Other impacts that should be presented are impacts resulting from truck traffic through communities.

### **Air Quality**

The document contains a statement on page 4-253 which indicates that this particular project will not be constructed until after 2010. "Construction of the Southern Beltway project is not currently included in SPC's latest Transportation and Development Plan for Southwestern Pennsylvania due to the lack of a reasonable financial plan under the recent financial planning changes". Using 2009 for analyzing the project's air quality impacts for the project's opening date for traffic should no longer be considered valid. A new analysis based on the most reasonable opening date assumption should be done.



The document contains a statement on page 4-253; "It is anticipated that as the project continues to develop and a financial plan becomes more clear, that SPC will add the project to the TIP and the project would be considered a conforming project" is assuming the project will conform prior to any new analysis being completed. As new lower 8-hour ozone mobile budgets will most likely be in place by the time any new analysis is done when this project is put back in the TIP/Plan, the statement should be revised to indicate that it will need to be tested again for conformity for the 8-hour ozone standards and new mobile budgets to determine if it does conform along with the other projects contained in the TIP.

The document contains a statement on page 4-254; "Based on the most recently available PADEP, Bureau of Air Quality report, "2004 DRAFT Ambient Air Quality Monitoring Report," at either the Pittsburgh or Washington, PA monitoring locations in 2004, for the eight-hour limit set at 84 ppb, there were no days when the ground level ozone exceeded this limit in Pittsburgh or for the Washington, PA location." As the area potentially violated the standard this summer (pending final QA/QC of the monitoring data by PADEP), that statement should be removed.

The PM2.5 Qualitative Analysis section write-up on 4-259 is insufficient. The statement in the report; "The basis for this determination is that the project will not serve a significant volume of diesel traffic as described in the regulations and guidance. Interagency consultation has confirmed this determination. As a result, no further project level air quality analysis for this pollutant is required" does not provide any rationale for this conclusion. Documentation of the Interagency consultation must be included along with detailed information on the screening process and the criteria used in evaluating the project against the FHWA/EPA guidance for determining whether the project is of air quality concern for PM2.5 must be included.

On page 4-258, paragraph 4. It states that the proposed project is scheduled for construction after the TIP period and therefore is not included in the program. The last sentence in that paragraph states that the project is included in the 2007-2010 TIP and the air quality conformity determination to satisfy federal reporting requirements. These two sentences contradict each other.

### **Environmental Justice**

This section assumed that unless an Environmental Justice population was twice that of the project area total, the difference would not be meaningfully significant. Documentation should be provided to demonstrate statistically that this is an appropriate measure of significance.

Based on the information provided it appears that there may be over 1,300 persons in the area that may not be able to read documents in English; however no mention is made to accommodate these residents.



Potential impacts to minority and low-income populations together as a whole should be evaluated as well as individually. There may be overlap as to where various minority and low-income populations reside in relationship to the project area activities.

### **Green Technologies**

The project team should consider low impact development <http://www.epa.gov/reg3esd1/nepa/LID.htm> and Green Highway technologies <http://www.greenhighways.org/> in the operation and design of the Southern Beltway.

